United States Department of Justice

United States Attorney
Northern District of New York

445 Broadway, Room 218   *Tel.: (518) 431-0247*
James T. Foley U.S. Courthouse *Fax: (518) 431-0249*
Albany, New York 12207-2924

November 1, 2024

BY ECF // FILED WITH REDACTIONS

Hon. Christian F. Hummel
U.S. Magistrate Judge
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, New York 12207

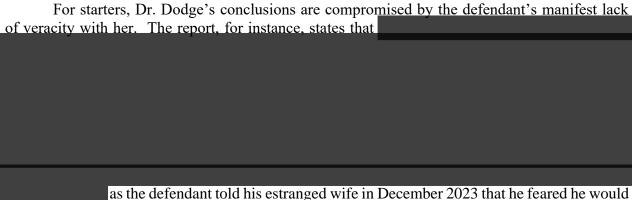RE: **United States v. Kris Roglieri**, No. 1:24-CR-392 (MAD)

Dear Judge Hummel:

We respectfully submit this letter in opposition to the defendant's second motion to reopen his detention hearing under 18 U.S.C. § 3142(f) (Dkt. # 48), which requires the movant to proffer new information that was (1) unavailable at the time of the initial detention hearing; and (2) would have been material to the court's original detention decision. The defendant's new motion suffers from the same fatal flaws as his prior attempt to re-litigate his pretrial detention. In August, this Court denied the defendant's first motion to reopen the detention hearing because "none of defendant's new submissions constitute new evidence which was unavailable at the time of the [June] detention hearing." Dkt. # 32 at 3. The Court then ruled that the defendant's newly proffered evidence also "fail[ed] to address in any way the allegation that defendant threatened to harm the attorneys, receiver, and judge in his bankruptcy proceeding and the allegation that he knew where three FBI agents lived and threatened to shoot at least one of them in the head." *Id.* Now, taking a third bite at the apple, the defense submits (1) a release and treatment plan recently prepared by Elizabeth Walker, a new mitigation specialist at the Federal Public Defender's Office; and (2) a forensic mental health assessment prepared in early October by Psychologist Victoria Dodge. The reports do not meet either prong of Section 3142(f)'s test, so reopening the detention hearing is, once again, not merited. As Your Honor already observed, defense counsel's "failure to request an adjournment of the original detention hearing to gather" materials such as "a mental health evaluation of defendant" is "not a sufficient basis upon which to justify a new detention hearing." Dkt. # 32 at 3. And even if that were not the case, the defense's newly proffered reports do not change the Court's prior finding that no set of conditions can mitigate the danger that the defendant poses. The instant motion should therefore be denied without a hearing.
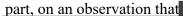
The Defendant Still Fails to Present Previously Unavailable Information. The defense's latest attempt to transform bail determinations into an iterative process should be rejected. The rationale for Section 3142(f)'s new evidence requirement is to encourage parties to be diligent in bringing forth all material evidence the first time a hearing is held and to discourage piecemeal

Page 2

presentations. *See, e.g.*, *United States v. Chappell*, 2017 WL 11517833, at *4 (N.D. Tex. Oct. 10, 2017). Here, the defense asks the Court to reopen the hearing because the Federal Public Defender's Office hired Ms. Walker in July. *See* Dkt. # 48 at 2. In the defense's telling, it was not possible to procure a release and treatment plan until Ms. Walker's onboarding. *See id.* This argument does not hold water. Indeed, at the conclusion of the June 3, 2024 detention hearing, defense counsel indicated that the defense might obtain a "risk or threat assessment" and "counseling plan," *see* June 3, 2024 Tr. at 20, showing that the defense was fully cognizant of the desirability of having such documents prepared for the Court at the time of the initial hearing. But rather than "request[ing] an adjournment of the original detention hearing to gather such information," the defense pressed on at the earliest possible juncture, which, as this Court already held, "is not a sufficient basis upon which to justify a new detention hearing." Dkt. # 32 at 3; *see United States v. Civitello*, No. 1:21-cr-386 (MAD) (N.D.N.Y. Feb. 23, 2022) (Stewart, J.) (denying motion to reopen detention hearing and explaining "[t]he failure to request a delay . . . is also not a sufficient justification for reopening the detention hearing"); *cf. United States v. Martin*, 2015 WL 1738362, at *2 (N.D. Cal. Apr. 13, 2015) (rejecting defense argument that defendant's completion of anger management classes while in pretrial detention constituted new information because under such a theory, "any defendant can seek to reopen detention hearings simply by taking courses offered to them while they are in custody," which "would lead to judicially inefficient practices"). This pattern then repeated itself: the defense filed its first motion to reopen the detention hearing on July 12, 2024 but did not submit any risk assessment materials or a release plan with that motion even though Ms. Walker joined the Federal Public Defender's Office around the same time. In other words, the defense has elected to proceed in a piecemeal fashion, which is improper. The motion can and should be denied on this basis alone. *See* Dkt. # 32 at 3; *see also, e.g.*, *United States v. Hare*, 873 F.2d 796, 799 (5th Cir. 1989); *United States v. Dillon*, 938 F.2d 1412, 1415 (1st Cir. 1991).

The Materials Proffered by the Defense Should Not Change the Court's Prior Decision. Even if the Court considers the defense's newly proffered materials on the merits, they do not present a basis to disturb the Court's sound conclusion that there are no release conditions that it could set to reasonably assure the safety of others. While the defense seizes upon Dr. Dodge's statement that the defendant's "risk of violence is minimal," a closer look at her report and Ms. Walker's submission reveals several troubling details.

For starters, Dr. Dodge's conclusions are compromised by the defendant's manifest lack of veracity with her. The report, for instance, states that ███████████████████████ ██ ██ ██ ██ ██ ████████████████ as the defendant told his estranged wife in December 2023 that he feared he would "rip off [her] fucking throat and piss down [her] fucking neck." Ex. 1 at 7; *see also id.* at 8 (defendant responding "I don't give a fuck abou the cops [*sic*]" when the recipient suggested that she would report threat to law enforcement). What is more, Dr. Dodge based her conclusions, in

Page 3

part, on an observation that ████████████████████████████████████
████████████████████████████ In doing so, she ostensibly overlooked the grand jury's finding of probable cause that the defendant engaged in a brazen multimillion-dollar fraud scheme, the defendant's own admissions to committing financial crimes in the text messages that the government previously submitted to the Court, detailed allegations of fraud that have been lodged against the defendant by counterparties in numerous courts, and pending state firearms charges against the defendant. Against this backdrop, Dr. Dodge's conclusions about the risks presented by the defendant are unconvincing.

Still, Dr. Dodge's report is remarkable for some of its *other* conclusions. In examining the
██
██
██
██
██
████████████████████████████████████ All of this paints a picture of someone who cannot be trusted to control himself. It should only intensify this Court's concerns that the defendant's statements leading up to his arrest are "deeply disturbing" and cannot be addressed adequately through even stringent release conditions. June 3, 2024 Tr. at 19.

Next, Ms. Walker's release and treatment plan likewise would not have changed the Court's prior determination that detention is required. Ms. Walker represents that "[e]verybody interviewed for this report, including Mr. Roglieri's ex-wife, Tina Roglieri, expressed support for his release from detention." Dkt. # 48-1. That representation lacks context. As Ms. Roglieri explains, she has serious concerns about the defendant's mental health and stability. *See* Ex. 2. Ms. Walker's plan, which suggests that the defendant will live in a different federal district (the Southern District of New York), also lacks specificity. It does not list the provider for the "weekly psychotherapy" sessions in which the defendant will engage. *See* Dkt. # 48-1 at 5. Nor does it explain how the defendant's brother, who lives in Troy, or his girlfriend, who works in Manhattan "several days per week," will serve as "third-party custodian[s]" for the defendant or what such a task would entail. *Id.* Beyond describing volunteer work, the report does not explain whether or how the defendant will seek employment, which is a nearly universal condition of pretrial release. Simply put, the release plan omits important details and does not address the Court's "grave concern" that the defendant could defeat even the most restrictive conditions to follow through on his threats. *See* June 3, 2024 Tr. at 18-19.

In sum, the defense's reliance on the reports for its claim that that "it is not possible for any able-bodied man to have a lower risk of violence than Mr. Roglieri," Dkt. # 48 at 2 & n.1, is misplaced. The reports do not warrant reopening the detention hearing because they will not have a material bearing on this Court's carefully reasoned detention decision.

                              *   *   *

For these reasons, the defendant's second motion to reopen his detention hearing should be denied in its entirety and without a hearing.

Page 4

Respectfully submitted,

CARLA B. FREEDMAN
United States Attorney

By: _____

Joshua R. Rosenthal
Michael Barnett
Assistant United States Attorneys
Bar Roll Nos. 700730 & 519140

cc: AFPD Matthew E. Trainor / AFPD Jeremy B. Sporn (by ECF)
       Senior U.S.P.O. Amy Brancatelli (by Email)

Exhibit 1

Extraction Report - Apple iOS Full File system

Cellebrite
www.cellebrite.com

Participants

_$!<Other>!$_* (owner)

Me* (owner)

Kris*

Conversation - Instant Messages (23)

From: ████████ Kris
To: ████████ e (owner)

I can't fucken wait until you bring a blue coller jack ass around.

Participant	Delivered	Read	Played
████ Me		12/3/2023 1:43:12 PM(UTC+0)	

Status: Read

12/3/2023 1:42:53 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E8F5DB (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ████████ Kris
To: ████████ Me (owner)

I'm gonna make fucking life so fucking miserable and emasculating. It's gonna be fucking hilarious.

Participant	Delivered	Read	Played
████ Me		12/3/2023 1:43:12 PM(UTC+0)	

Status: Read

12/3/2023 1:43:05 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E8F367 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

1

From: ███████ Kris
To: ███████ Me (owner)

I get even times worse

Participant	Delivered	Read	Played
███████ Me		12/3/2023 1:43:19 PM(UTC+0)	

Status: Read

12/3/2023 1:43:19 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90F83 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ███████ Kris
To: ███████ Me (owner)

Remember that

Participant	Delivered	Read	Played
███████ Me		12/3/2023 1:43:22 PM(UTC+0)	

Status: Read

12/3/2023 1:43:22 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90D6C (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ███████ Kris
To: ███████ e (owner)

That's who I am

Participant	Delivered	Read	Played
███████ Me		12/3/2023 1:43:25 PM(UTC+0)	

Status: Read

12/3/2023 1:43:25 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90B67 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Me (owner)
To: ▮▮▮▮▮ Kris

lol

Participant		Delivered	Read	Played
▮▮▮▮ Kris		12/3/2023 1:43:29 PM(UTC+0)		

Status: Sent

12/3/2023 1:43:29 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90964 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Me (owner)
To: ▮▮▮▮▮ Kris

I don't care

Participant		Delivered	Read	Played
▮▮▮▮ Kris		12/3/2023 1:43:40 PM(UTC+0)		

Status: Sent

12/3/2023 1:43:40 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90744 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Kris
To: ▮▮▮▮▮ e (owner)

You will

Participant		Delivered	Read	Played
▮▮▮▮ Me			12/3/2023 1:43:47 PM(UTC+0)	

Status: Read

12/3/2023 1:43:46 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90504 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: [REDACTED] Kris
To: [REDACTED] Me (owner)

When that time comes

Participant	Delivered	Read	Played
[REDACTED] Me		12/3/2023 1:43:52 PM(UTC +0)	

Status: Read

12/3/2023 1:43:52 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E90309 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
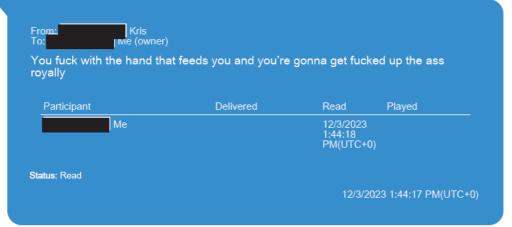0xE6FAA (Table: message; Size: 1128912 bytes)

From: [REDACTED] Kris
To: [REDACTED] Me (owner)

You fuck with the hand that feeds you and you're gonna get fucked up the ass royally

Participant	Delivered	Read	Played
[REDACTED] Me		12/3/2023 1:44:18 PM(UTC+0)	

Status: Read

12/3/2023 1:44:17 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E91F83 (Table: message, handle; Size:
121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size:
1128912 bytes)

From: [REDACTED] Me (owner)
To: [REDACTED] Kris

Please stop texting me .

Participant	Delivered	Read	Played
[REDACTED] Kris	12/3/2023 1:44:38 PM(UTC+0)		

Status: Sent

12/3/2023 1:44:37 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E91CF7 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮▮ Me (owner)
To: ▮▮▮▮▮▮ Kris

I don't care

Participant		Delivered	Read	Played
▮▮▮▮▮ Kris		12/3/2023 1:44:40 PM(UTC+0)		

Status: Sent

12/3/2023 1:44:39 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E91AAB (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
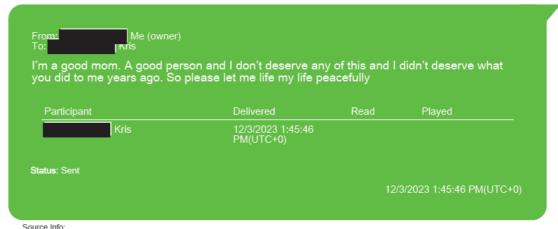0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮▮ Me (owner)
To: ▮▮▮▮▮▮ Kris

I'm a good mom. A good person and I don't deserve any of this and I didn't deserve what you did to me years ago. So please let me life my life peacefully

Participant		Delivered	Read	Played
▮▮▮▮▮ Kris		12/3/2023 1:45:46 PM(UTC+0)		

Status: Sent

12/3/2023 1:45:46 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E91875 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮▮ Kris
To: ▮▮▮▮▮▮ Me (owner)

Go to the chicken farm where you fucking belong.

Participant		Delivered	Read	Played
▮▮▮▮▮ Me			12/3/2023 1:45:54 PM(UTC +0)	

Status: Read

12/3/2023 1:45:54 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E9150C
(Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA
(Table: message; Size: 1128912 bytes)

5

From: ▮▮▮▮▮ Kris
To: ▮▮▮▮▮ Me (owner)

Let me live peacefully instead of fuck out of my business

Participant	Delivered	Read	Played
▮▮▮▮▮ Me		12/3/2023 1:46:19 PM(UTC+0)	

Status: Read

12/3/2023 1:46:19 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E92B55 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Kris
To: ▮▮▮▮▮ Me (owner)

Stay the fuck out of my business

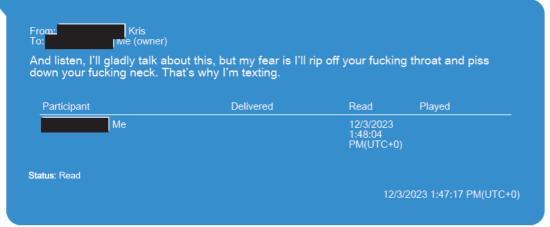| Participant	Delivered	Read	Played
▮▮▮▮▮ Me		12/3/2023 1:46:35 PM(UTC+0)	

Status: Read

12/3/2023 1:46:35 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E928F7 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Me (owner)
To: ▮▮▮▮▮ Kris

Let's be clear . I didn't say a word to you about this

Participant	Delivered	Read	Played
▮▮▮▮▮ Kris	12/3/2023 1:46:41 PM(UTC+0)		

Status: Sent

12/3/2023 1:46:41 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E926D6 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Kris
To: ▮▮▮▮▮ Me (owner)

And whatever happens or comes to my house

Participant	Delivered	Read	Played
▮▮▮▮▮ Me		12/3/2023 1:46:52 PM(UTC+0)	

Status: Read

12/3/2023 1:46:51 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db :
0x4E9243B (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal :
0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Kris
To: ▮▮▮▮▮ Me (owner)

And listen, I'll gladly talk about this, but my fear is I'll rip off your fucking throat and piss down your fucking neck. That's why I'm texting.

Participant	Delivered	Read	Played
▮▮▮▮▮ Me		12/3/2023 1:48:04 PM(UTC+0)	

Status: Read

12/3/2023 1:47:17 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E93F83 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: ▮▮▮▮▮ Me (owner)
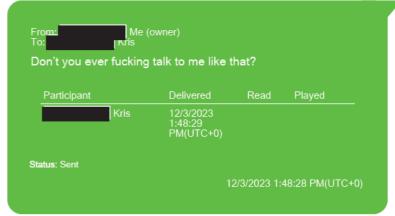To: ▮▮▮▮▮ ris

Keep talking like that to me and I'm gonna go to the cops. How about that?

Participant	Delivered	Read	Played
▮▮▮▮▮ Kris	12/3/2023 1:48:16 PM(UTC+0)		

Status: Sent

12/3/2023 1:48:16 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E95F8D (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)
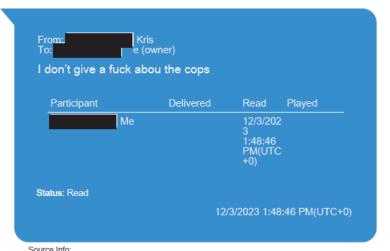
From: [REDACTED] Me (owner)
To: [REDACTED] Kris

You are not going to fucking abuse me

Participant	Delivered	Read	Played
[REDACTED] Kris	12/3/2023 1:48:22 PM(UTC+0)		

Status: Sent

12/3/2023 1:48:22 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E95CDA (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: [REDACTED] Me (owner)
To: [REDACTED] Kris

Don't you ever fucking talk to me like that?

Participant	Delivered	Read	Played
[REDACTED] Kris	12/3/2023 1:48:29 PM(UTC+0)		

Status: Sent

12/3/2023 1:48:28 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E95A76 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

From: [REDACTED] Kris
To: [REDACTED] e (owner)

I don't give a fuck abou the cops

Participant	Delivered	Read	Played
[REDACTED] Me		12/3/2023 1:48:46 PM(UTC+0)	

Status: Read

12/3/2023 1:48:46 PM(UTC+0)

Source Info:
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db : 0x4E957F6 (Table: message, handle; Size: 121409536 bytes)
00008110-00114C3822C0401E_files_full.zip/private/var/mobile/Library/SMS/sms.db-wal : 0xE6FAA (Table: message; Size: 1128912 bytes)

Exhibit 2

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

      -against-

                                            DECLARATION

KRIS ROGLIERI,   **Case No.: 1:24-cr-00392-MAD**

                             Defendant.

STATE OF NEW YORK   )
COUNTY OF ALBANY   ) ss.:

Tina Roglieri, under penalty of perjury, declares as follows:

1.   I am the estranged wife of Kris Roglieri. We were married on January 16, 2009 and share two children.

2.   Kris and I have been separated since August of 2019 and we are in the process of obtaining a divorce.

3.   Earlier this month, I was contacted by a social worker who told me she was working for Kris and his attorneys and that she had some questions for me about Kris and his relationship with our children.

4.   I was caught off guard and surprised that Kris's lawyers would have someone contact me directly without going through my attorney, but I nevertheless agreed to speak with her.

5.   Subsequently, I reviewed a letter dated 10/18/24 from this social worker addressed to the court, purportedly summarizing my answers to the social worker's questions.

6.   The social worker left out some important things I told her, and I want to bring those things to the Court's attention.

{01554033.1}

12.   I declare under penalty of perjury that the foregoing is true and correct. Executed on this 29th day of October, 2024.

_____
TINA ROGLIERI